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November 20, 2018

## Ex Parte Filing

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: CG Docket 17-59, Advanced Methods to Target and Eliminate Unlawful Robocalls

Dear Ms. Dortch:

Ann Berkowitz and the undersigned, both of Somos, communicated with Ann Stevens, Marilyn Jones, Heather Hendrickson and William Andrle of the Wireline Competition Bureau, by telephone on November 19, 2018, regarding the above captioned proceeding and the Commission's proposal to create a reassigned number database. This ex parte also covers a brief telephone conversation Ann Berkowitz had on November 14 with Marilyn Jones and a conversation between Joel Bernstein and William Andrle on November 16. In all conversations, Somos was acting in its capacity as the Toll-Free Numbering Administrator (TFNA). Somos did not take a position as to any policy issues in the proceeding.

During the conversations, we discussed the parameters of providing disconnected Toll-Free Numbers (TFNs) into the reassigned numbers database. Somos confirmed that it is capable of providing TFN disconnected data and stated that it would more efficient for Somos, as the TFNA, to provide the collective information rather than having the 470+ Resp Orgs provide it individually.

Somos also clarified that the SMS/800 Toll-Free Number Registry automatically returns a TFN to the spare pool if it has been in disconnect (or combined disconnect and transitional) status for four calendar months. The system currently has no minimum time a TFN must be in disconnect/transition status before returning it to the spare pool. Should the Commission institute a minimum aging period for disconnected TFNs, Somos will update the SMS/800 Toll-Free Number Registry to ensure that TFNs cannot be spared before that minimum time expires.

## Respectfully submitted,

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cc: Ann Stevens

Marilyn Jones

Heather Hendrickson

William Andrle